

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
MICHAEL A. KEOUGH (NYRN 5199666)  
Assistant United States Attorney  
  
450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
Fax: (415) 436-6570  
Email: michael.keough@usdoj.gov

*Attorneys for the United States of America*

JABA TSITSUASHVILI (CABN 309012)  
PATRICK JAICOMO (MIBN P-75705)\*  
INSTITUTE FOR JUSTICE  
901 N. Glebe Road, Suite 900  
Arlington, Virginia 22203  
Tel: (703) 682-9320  
Fax: (703) 682-9321  
jtsitsuashvili@ij.org  
pjaicomo@ij.org

*\*Admitted pro hac vice*

ANNA M. BARVIR (CABN 268728)  
MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
Long Beach, California 90802  
Tel: (562) 216-4444  
Fax: (562) 216-4445  
abarvir@michellawyers.com

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RENÉ QUIÑONEZ and MOVEMENT INK  
LLC,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 3:22-CV-03195-WHO

**STIPULATION REGARDING RESPONSE  
DATE AND CASE MANAGEMENT  
CONFERENCE; [PROPOSED] ORDER**

Pursuant to Civil Local Rules 6-2(a) and 7-12, and subject to the Court's approval, Plaintiffs René Quiñonez and Movement Ink LLC ("Plaintiffs") and Defendant the United States of America (together, the "Parties"), hereby stipulate and request that the Court adopt the following modifications to the case schedule:

STIPULATION REGARDING RESPONSE DATE AND CMC DATE  
Case No: 3:22-cv-03195-WHO

Amendments per Dkt. 80:

July 31, 2023

Answer:

August 31, 2023

Case Management Conference statement due:

October 10, 2023

Case Management Conference:

October 17, 2023, 2:00 p.m.

The proposed schedule above addresses upcoming unavailability of counsel due to travel out of the country by Plaintiffs' lead counsel and parental leave by Defendants' counsel. The Parties have met and conferred and respectfully submit that the proposed schedule will conserve the resources of the Parties and the Court while ensuring the speedy resolution of this matter.

SO STIPULATED.

DATED: July 7, 2023

Respectfully submitted,

ISMAIL J. RAMSEY  
United States Attorney

/s/ Michael A. Keough  
MICHAEL A. KEOUGH  
Assistant United States Attorney

*Attorneys for the United States of America*

/s/ Jaba Tsitsuashvili\*  
JABA TSITSUASHVILI  
INSTITUTE FOR JUSTICE

*Attorney for Plaintiffs*

*\* In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.*

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.** The parties shall comply with the following case deadlines:

Amendments per Dkt. 80:	July 31, 2023
Answer:	August 31, 2023
Case Management Conference statement due:	October 10, 2023
Case Management Conference:	October 17, 2023, 2:00 p.m.

DATE:

---

THE HONORABLE WILLIAM H. ORRICK  
United States District Judge